

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SUZANNE GREENE,

Plaintiff,

vs.

TYLER TECHNOLOGIES, INC.,

Defendant.

Civil Action No. 1:19-cv-1338-AT

**UNOPPOSED MOTION FOR 2-DAY EXTENSION OF TIME TO FILE PLAINTIFF'S
RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Suzanne Green moves the Court to extend the deadline for her to file her Response to Defendant's Motion for Summary Judgment [Dkt. 56], through and including May 6, 2020, showing the Court as follows:

1. On Monday, April 6, 2020, Defendant filed a motion for summary judgment [Dkt. 56] and Plaintiff filed a motion for partial summary judgment. [Dkt. 57]
2. The Court previously granted the Parties' Motion for a two-week extension of time to file their respective responses. [Dkt. 63]
3. Due to another major motion deadline on Saturday, May 2, 2020, the undersigned counsel has been delayed in drafting Plaintiff's Response and is concerned that the Response may not be complete by the current deadline.

4. Out of an abundance of caution, Plaintiff requests a two-day extension to file her Response, through and including Wednesday, May 6, 2020.
5. Defendant's counsel has indicated in writing that Defendant does not oppose the requested extension.
6. This request is made in good faith and not for the purpose of undue delay.
7. A proposed order is attached for the Court's convenience.

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadline for Plaintiff to file her Response to Defendant's Motion for Summary Judgment by two days, through and including May 6, 2020.

This 4th day of May 2020,

Respectfully submitted,

**DELONG CALDWELL BRIDGERS
FITZPATRICK & BENJAMIN, LLC**

s/Matthew W. Herrington

Mitchell D. Benjamin
Georgia Bar No. 049888
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CERTIFICATE OF SERVICE

I certify that on this date, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, thereby ensuring electronic service upon all counsel of record.

Dated: May 4, 2020

s/Matthew W. Herrington
Matthew W. Herrington
Ga. Bar No. 275411